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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**
9

10 UNITED STATES OF AMERICA,)

2:12-CR-00465-GMN-CWH

11 Plaintiff,)

12 vs.)

STIPULATION FOR PROTECTIVE ORDER

13 CHANTEL M. MCKINNEY, et al.)

14 Defendants.)
15

16 IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden,
17 United States Attorney for the District of Nevada, and Kimberly M. Frayn, Assistant United States
18 Attorney, counsel for the United States, Thomas A. Ericsson, Esq., counsel for defendant
19 CHANTEL M. MCKINNEY, that this Court issue an Order protecting from disclosure to the
20 public any discovery documents containing the personal identifying and financial identifying
21 information, such as social security numbers, drivers license numbers, dates of birth, bank account
22 numbers, credit and debit card numbers, and addresses, of participants, witnesses and victims in
23 this case. Such documents shall be referred to hereinafter as "Protected Documents." The parties
24 state as follows:

25 1. Protected Documents which will be used by the government in its case in chief
26 include personal identifying information and financial identifying information, such as social

1 security numbers, drivers license numbers, dates of birth, bank account numbers, credit and debit
2 card numbers, and addresses, of participants, witnesses, and victims in this case.

3 2. Discovery in this case is voluminous and includes many of documents which
4 contain personal and financial identifiers. Redacting the personal and financial identifiers of
5 participants, witnesses, and victims would prevent the timely disclosure of discovery to
6 defendants.

7 3. The United States agrees to provide Protected Documents without redacting the
8 personal identifiers and financial identifiers of participants, witnesses, and victims.

9 4. Access to Protected Documents will be restricted to persons authorized by the
10 Court, namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts,
11 and secretaries employed by the attorney(s) of record and performing on behalf of defendant.

12 5. The following restrictions will be placed on defendant, defendant's attorney(s) and
13 the above-designated individuals unless and until further ordered by the Court. Defendants,
14 defendants' attorneys and the above-designated individuals shall not:

15 a. make copies for, or allow copies of any kind to be made, by any other
16 person of Protected Documents;

17 b. allow any other person to read Protected Documents; and

18 c. use Protected Documents for any other purpose other than preparing to
19 defend against the charges in the Indictment or any further superseding indictments arising out of
20 this case.

21 6. Defendant's attorney(s) shall inform any person to whom disclosure may be made
22 pursuant to this order of the existence and terms of this Court's order.

23 7. The requested restrictions shall not restrict the use or introduction as evidence of
24 discovery documents containing personal identifying and financial identifying information, such as
25 social security numbers, drivers license numbers, dates of birth, bank account numbers, credit and
26

1 debit card numbers, and addresses, of participants, witnesses and victims during the trial of this
2 matter.

3 8. Upon conclusion of this action, defendant's attorney(s) shall return to government
4 counsel or destroy and certify to government counsel the destruction of all discovery documents
5 containing personal identifying and financial identifying information such as social security
6 numbers, drivers license numbers, dates of birth, bank account numbers, credit and debit card
7 numbers, and addresses, within a reasonable time, not to exceed thirty days after the
8 last appeal is final.

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10 DANIEL G. BOGDEN
11 United States Attorney

12 /s/ Kimberly M. Frayn
13 KIMBERLY M. FRAYN
Assistant United States Attorney

February 12, 2013
DATE

14
15 /s/ Thomas A. Ericsson, Esq.
16 THOMAS A. ERICSSON, ESQ.
17 Counsel for defendant
CHANTEL M. MCKINNEY,

February 12, 2013
DATE

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19 **ORDER**

20 IT IS SO ORDERED this 13 day of February 2013.

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23 UNITED STATES MAGISTRATE JUDGE
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